

VLADECK, RASKIN & CLARK, P.C.

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September 22, 2022

Hon. Andrew L. Carter, Jr.
United States District Court Judge
United States District Court SDNY
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: *United States v. Perry Joyner*, 21 Cr 673 (ALC)

Dear Judge Carter:

I write on behalf of six defense counsel¹ and their clients in the above captioned matter and with the consent of the Government to request an adjournment of the current motion schedule and Court appearance.

Currently defense motions are due on October 3, 2022 with Government response due on October 26, 2022, defense replies are due on the 2nd of November and our next Court conference is scheduled for December 6, 2022.

The parties jointly propose an adjournment of the current motions schedule to defense motions on November 14, 2022, Government response on December 12th and defense replies on December 19, 2022. If the Court approves the schedule we would propose the next court conference be adjourned until the week of January 16, 2023 at the convenience of the Court. Of course, all defendants consent to the exclusion of time under the Speedy Trial Act.

The basis for the request is that the parties continue to discuss potential dispositions and an overall resolution of the matter short of trial, but also due to the volume of discovery that defense counsel believes still needs to be reviewed. We are endeavoring to do so as quickly as possible. In order to facilitate defense review as well as ongoing negotiations, the Government has agreed to this request for an adjournment. Thank you for your time and attention to this application.

Sincerely,

Susan J. Walsh

cc: Aline Flodr, AUSA
Dan Wolfe, AUSA
Jon Rebold, AUSA

The entire application is **GRANTED**. Defense motions due 11/14/22, Government response due 12/12/22, replies, if any, due 12/19/22. The status conference is adjourned to 1/19/23 at 12 p.m. Time excluded from 12/6/22 to 1/19/23 in the interest of justice. So Ordered. *Andrew L. Carter* 9/27/22

¹ I respectfully write on behalf of my client Mr. Joyner and James Neuman, Esere Oanodowan, Doug Touger, Thomas Dunn, Dawn Florio all expressly join in this request on behalf of their respective clients.